

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

IN RE:

KHAN AVIATION, INC.,

Debtor.

Bankruptcy No. 19-04261-SWD  
Honorable Scott W. Dales  
Chapter 11

**NOTICE OF MOTION (AND PROPOSED ORDER) AND OPPORTUNITY TO OBJECT**

PNC Equipment Finance, LLC has filed a Motion for Relief from Automatic Stay and has requested the Court to enter an Order for Relief from Automatic Stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to enter the Order for Relief from Automatic Stay, or if you want the Court to consider your views on the Motion, within 14 days, you or your attorney must:

1. File with the Court a written response or an answer, explaining your position, at<sup>1</sup>:

United States Bankruptcy Court  
One Division Ave., N.W.  
Grand Rapids, Michigan 49503

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

Lisa A. Hall  
Plunkett Cooney  
333 Bridge Street NW, Suite 530  
Grand Rapids, MI 49504

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<sup>1</sup> Response or answer must comply with F.R. Civ. P. 8(b), (c) and (e).

Daniel J. Skekloff  
Haller & Colvin, P.C.  
444 East Main Street  
Fort Wayne, IN 46802

Denise D. Twinney  
Robert F. Wardrop, II  
Wardrop & Wardrop, P.C.  
300 Ottawa Avenue, N.W., Ste 150  
Grand Rapids, MI 49503  
(616) 459-1225

Kevin M. Smith  
Beadle Smith PLC  
445 South Livernois  
Suite 305  
Rochester Hills, MI 48307

Office of The United States Trustee  
125 Ottawa, N.W., Suite 200R  
Grand Rapids, Michigan 49503

2. If a response or answer is timely filed and served, the Clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion or objection and may enter an order granting that relief.

Dated: December 13, 2019

PLUNKETT COONEY  
Attorneys for PNC Equipment Finance, LLC

By: /s/ Lisa A. Hall  
Lisa A. Hall (P70200)  
BUSINESS ADDRESS:  
333 Bridge Street NW, Suite 530  
Grand Rapids, MI 49504  
Direct: (616) 752-4615  
[lhall@plunkettcooney.com](mailto:lhall@plunkettcooney.com)